

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

**RENEWED NOTICE OF APPEARANCE AND REQUEST FOR SERVICE**

PLEASE TAKE NOTICE that the undersigned counsel hereby renews their appearance for Crossroads Centre II, LLC, Surprise Towne Center Holdings, LLC, Vestar-CPT Tempe Marketplace, LLC, Outer Drive 39 Development Co. LLC, and Lansing Square, LLC (collectively, the “**Landlords**”), pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. 101, *et seq.*, Rule 9010(b) of the Federal Rules of Bankruptcy Procedure in the above-captioned, jointly administered bankruptcy cases.

FURTHER, PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(b) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Delaware, the undersigned requests that all notices and all other papers required to be served in this case be served upon the following persons and that the following persons be added to the mailing matrix in this case:

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<sup>1</sup> The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. The term “Reorganized Debtors” includes Franchise Group, Inc. and certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service, nor any subsequent appearance, pleading, claim or suit, is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of the Landlords including, without limitation: (a) the right to have final orders in non-core matters entered only after *de novo* review by a federal district court judge; (b) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (c) the right to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionary withdrawal; (d) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the district court, or (e) any other rights, claims, actions, defenses, setoffs, or recoupment to which the Landlords are or may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Landlords expressly state otherwise, the Landlords do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: August 11, 2025

**CLARK HILL PLC**

By: /s/ Karen M. Grivner  
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